

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF ILLINOIS**

RE:)	In Proceedings
)	Under Chapter 13
TEDDY A. GOODMAN and)	
DARLA K. GOODMAN,)	
)	
Debtors.)	
)	BK 20-31082
RUSSELL C. SIMON,)	
)	
Chapter 13 Trustee/Objector,)	
)	
v.)	
)	
US BANK TRUST NA TRUSTEE,)	
(CLAIM #8-1))	
)	
Creditor/ Respondent.)	

RESPONSE TO TRUSTEE’S OBJECTION TO CLAIM

COME NOW the Debtors, Teddy and Darla Goodman, by and through their attorneys, Law Office of Ronald A. Buch, L.L.C., and for their Response to Trustee’s Objection to Proof of Claim states as follows:

1. On November 25, 2020, the Debtors filed for relief under Chapter 13 of the Bankruptcy Code.
2. On January 14, 2021, US Bank Trust NA Trustee, filed Proof of Claim #8-1.
3. The Creditor did not complete Part 5 of Official Form 410A. However, the Creditor did attach a loan history and a breakdown of the principal and interest due as attachments to the Proof of Claim.
4. On January 27, 2021, the Trustee filed his Objection to Proof of Claim #8-1. The basis for the Trustee’s Objection is that “Official Form B410 Attachment failed to include the part 5 loan payment history to provide a breakdown of the principal and

interest due.” The Trustee’s Objection requests that the arrearage be reduced from \$47,262.88 to \$0.00.

5. Debtor’s counsel contacted US Bank Trust NA Trustee and was informed that an Amended Proof of Claim would be filed prior to the deadline to respond to the Trustee’s Objection. The Amended Proof of Claim has not been filed.

6. It is in the Debtors’ best interest for the arrearage claim to be paid.

WHEREFORE, the Debtors respectfully request that this Court deny the Trustee’s Objection to Claim #8-1, and for any further relief that this Court deems just and proper.

TEDDY & DARLA GOODMAN,

By: /s/ Ronald A. Buch
Ronald A. Buch #6209955
Kimberly D. Litherland #6299352
Attorneys for Debtors
Law Office of Ronald A. Buch, LLC
5312 West Main Street
Belleville, IL 62226
(618) 236-7000
belleville@tbcwam.com

**NOTICE OF ELECTRONIC FILING AND
CERTIFICATE OF SERVICE BY MAIL**

STATE OF ILLINOIS)	BK	20-31082
)	SS	
CITY OF BELLEVILLE)	Chapter 13	

Jennifer Schweiger, being duly sworn, deposes and says:

Deponent is not a party to the action, is over 18 years of age, and resides in St. Clair County, Illinois.

On March 1, 2021, Deponent electronically filed with the Clerk of the U. S. Bankruptcy Court the **Response to Trustee's Objection to Proof of Claim.**

The Deponent served electronically the **Response to Trustee's Objection to Proof of Claim** to the following parties:

U.S. Trustee

Russell Simon

and served by mail to the following parties:

Teddy & Darla Goodman	US Bank Trust NA Trustee
3090 Hanover Rd.	c/o BSI Financial Services
Waterloo, IL 62298	314 Franklin St.
	PO Box 517
	Titusville, PA 16354

by depositing a true copy of same, enclosed in a postage paid properly addressed wrapper, in a Belleville City Branch, official depository under the exclusive care and custody of the United States Postal Service, within the State of Illinois.

By: /s/ Jennifer Schweiger